

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

In re:	:	CHAPTER 13 PROCEEDING
	:	
SHEDRICK & LATASHA MARTIN	:	CASE NO: 23-51080 AEC
	:	
	:	
Debtor(s)	:	

NOTICE OF MOTION TO MODIFY CHAPTER 13 PLAN BEFORE CONFIRMATION

SHEDRICK & LATASHA MARTIN, DEBTOR(S) IN THE ABOVE-STYLED BANKRUPTCY MATTER, FILED PAPERS WITH THE COURT TO MODIFY CHAPTER 13 PLAN BEFORE CONFIRMATION.

YOUR RIGHTS MAY BE AFFECTED. You should read these documents carefully and discuss them with your attorney, if you have one in this bankruptcy case. **If you do not have an attorney, you may wish to consult one.** If not served with this notice in accordance with the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure, a copy of the motion [or other type of pleading] may be obtained upon written request to counsel for the Movant (identified below) or at the Clerk's office.

The confirmation is scheduled for **NOVEMBER 20, 2023.** If you do not want the court to grant this motion, or if you want the court to consider your views on the motion, then you or your attorney shall file with the court a written objection or response no later than 7 days before the date set for the rescheduled confirmation hearing noted below **and attend the rescheduled confirmation hearing.** The objection or response should be sent to:

Clerk, U.S. Bankruptcy Court
Middle District of Georgia
P.O. Box 1957
Macon, GA 31202.

The **rescheduled** confirmation hearing shall be held on:

DECEMBER 11, 2023, at 1:30 P.M.,
U.S. Bankruptcy Courtroom A, 433 Cherry Street, Macon, Georgia, 31201

If you mail your response or objection to the court for filing, you shall send it early enough so the court will **receive** the objection or response on or before the response deadline stated above. Any response or objection shall also be served on the movant.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting such relief.

Parties should consult the Court's website (www.gamb.uscourts.gov) concerning whether the hearing will be in-person, telephonic, or virtual. Please refer to Administrative Order # 145 for more guidance.

This notice is sent by the undersigned pursuant to L.B.R. 3015-2(d)(2)(A).

Dated this **24th day of October, 2023.**

Alex D. Sanders
Attorney for Debtor
577 Mulberry Street, St. 1525
Macon, Georgia 31201
Phone: (478) 841-9467

Kyle George, Clerk
United States Bankruptcy Court
P.O. Box 1957
Macon, Georgia 31202
Phone: (478) 752-3506

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MOTION TO MODIFY CHAPTER 13 PLAN BEFORE CONFIRMATION

COMES NOW, SHEDRICK & LATASHA MARTIN, the debtor(s) under the authority of Section 1323 of the Bankruptcy Code, and file(s) this Motion to Modify Chapter 13 Plan Before Confirmation and respectfully show(s):

1.

Debtors assert that their bankruptcy petition was filed on the 10th of August, 2023.

2.

Debtors propose to make the following changes to the plan as heretofore attached.

3.

Under Part 5.1 (c), Debtors propose to pay \$26,900.00 to unsecured creditors.

4.

Under Part 2.1, plan payment will increase to \$458.00 per week.

After notice and opportunity for objections, the plan as modified should become the debtor's plan.

WHEREFORE, the debtor's pray(s) that their Motion for Modification of Plan be approved.

This **24th** day of **October, 2023.**

577 Mulberry St., Ste. 1525
Macon, GA. 31201
Phone 478-841-9467
asanders@kelleylovett.com

/s/ Alex D. Sanders
Kelley, Lovett & Blakey, PC
Attorney for Debtor
Ga. State Bar No. 081012

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CERTIFICATION OF SERVICE

I, Alex D. Sanders, certify that I am, and at all times hereinafter mentioned, was more than 18 years of age, and that on the 24th day of October, 2023, I served a copy of the Amended Notice and Motion to Modify the Plan upon the Chapter 13 Trustee, Camille Hope, by electronic notice, and to the all parties on the attached creditors matrix by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage to insure delivery.

/s/ Alex D. Sanders .
Attorney for Debtor
577 Mulberry Street, Ste 1525
Macon, GA 31201
478-841-9467
asanders@kelleylovett.com